



**Office of the New York State  
Attorney General**

**Letitia James  
Attorney General**

December 31, 2024

**By ECF**

Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Estevez v. City of New York, et al.*, SDNY No. 24-cv-7165 (NRB)

Dear Judge Buchwald:

The Office of the New York State Attorney General ("OAG") represents defendant David Walsh, and has received requests for representation from defendants Oliver Pu-Folkes and Bradford Miller in the above-referenced action. All three of these defendants are current OAG employees. OAG also anticipates receiving a request for representation from defendant John McManus, who is a former OAG employee, upon proper service being effectuated.

According to docket entries dated December 18, 2024 (ECF Nos. 7, 8, 9, 10), responsive pleadings for defendants Walsh, Pu-Folkes, Miller and McManus (collectively, "State Defendants") are currently due by January 7, 2025. OAG respectfully requests an extension of time, from January 7, 2025 to February 6, 2025, for these four defendants to respond to the Complaint. The requested extension is necessary to finalize the statutorily-mandated representation process pursuant to N.Y. Public Officers' Law § 17, and to investigate the allegations in the Complaint and prepare an appropriate response. This is the first request for an extension of State Defendants' time to respond to the Complaint. Plaintiff's counsel consents to this request.

Application  
granted.  
Name  
Reice  
Buchwald  
1/2/25

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/Yuval Rubinstein  
Special Litigation Counsel  
(212) 416-8673  
[yuval.rubinstein@ag.ny.gov](mailto:yuval.rubinstein@ag.ny.gov)

cc: Plaintiff's Counsel (Via ECF)